



# Section 114

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ICC

# Topics

- Congressional Mandate
- PIPES Act
- Data
- Inadequate Programs
- Deadlines
- Rollout
- Checklist Development
- Inspections
- Comptroller
- Rulemaking
- News Media



# PIPES Act of 2020

- Protecting our Infrastructure of Pipelines and Enhancing Safety Act
- The Act authorizes PHMSA and is reauthorized every 4 years

# Congressional Mandate

- Congress
- Self executing mandate
- Does not require regulations



# PIPES Act of 2020

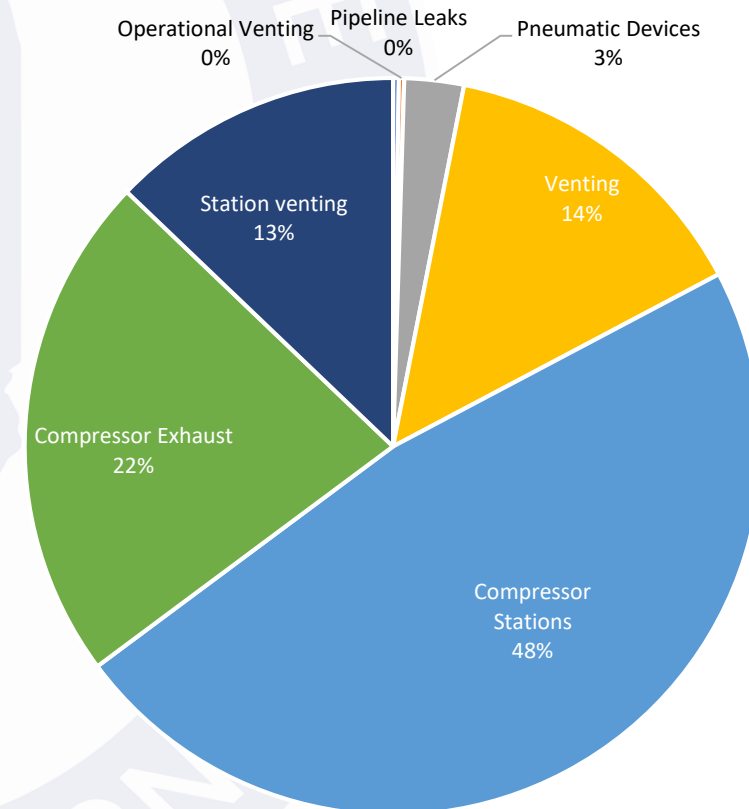
- §192.703 requires an operator to promptly repair hazardous leaks
- Currently only hazardous leaks
- Section 114 goes beyond the existing requirement
- Evaluate Operator inspection and maintenance plans to address ...
  - (a)(2)(D) the extent to which the plan will contribute to—
    - (i) public safety;
    - (ii) eliminating hazardous leaks and minimizing releases of natural gas from pipeline facilities; and
    - (iii) the protection of the environment;

# PIPES Act of 2020

- Minimize releases
- Fugitive emissions – methane that “leaks” unintentionally from equipment such as from pipelines, flanges, valves, or other equipment
- Vented emissions – methane that is released due to equipment design or operational/maintenance procedures, such as from pneumatic device bleeds, blowdowns, incomplete combustion, equipment venting, or reliefs

# Data – Gas Transmission

Source	Kt CH4 in 2018
Pipeline Leaks	3.3
Venting (Normal Operation)	3.0
Pneumatic Devices	34.1
Venting (Maintenance and Upset)	185.0
Compressor Station Leaks	621.2
Compressor Exhaust	291.5
Venting (stations)	167.9
Total	1,306.0



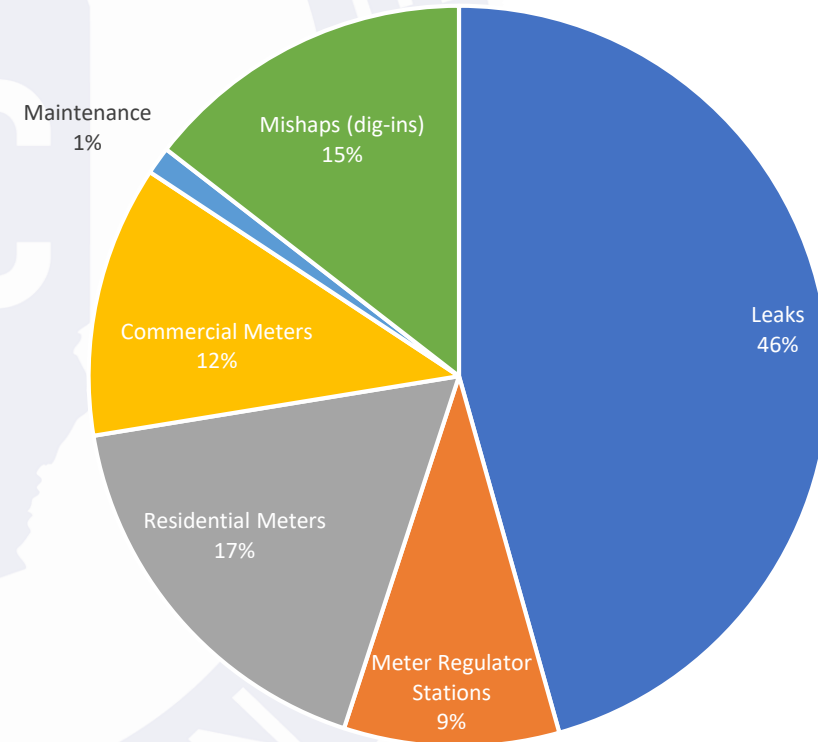
# Data – Gas Transmission

- Majority of gas transmission emissions are vented emissions
- Sources of vented emissions include:
  - Blowdowns associated with repairs/maintenance, and replacement/construction
  - Vents from equipment such as pressure relief devices, regulators (gas use), Emergency shut down devices (ESD)
  - Ruptures and Major leaks (incidents)
  - Current facility/equipment designs



# Data – Gas Distribution

Source	Kt CH4 in 2018
Service/Mains leaks	215.8
Meter/Regulator stations	44.4
Residential Meters	82.3
Commercial/Industrial Meters	56.1
Maintenance	5.7
Mishaps (dig-ins)	68.6
<b>Net Emissions</b>	<b>472</b>



# Data – Gas Distribution

- Majority of gas distribution emissions are fugitive emissions
- Sources of fugitive emissions include:
  - Problematic pipe, especially cast iron and bare-steel systems, plastic system with known problems
  - Commercial/industrial meter sets
  - Residential meter sets
  - Excavation damage and other incidents

# PIPES Act of 2020

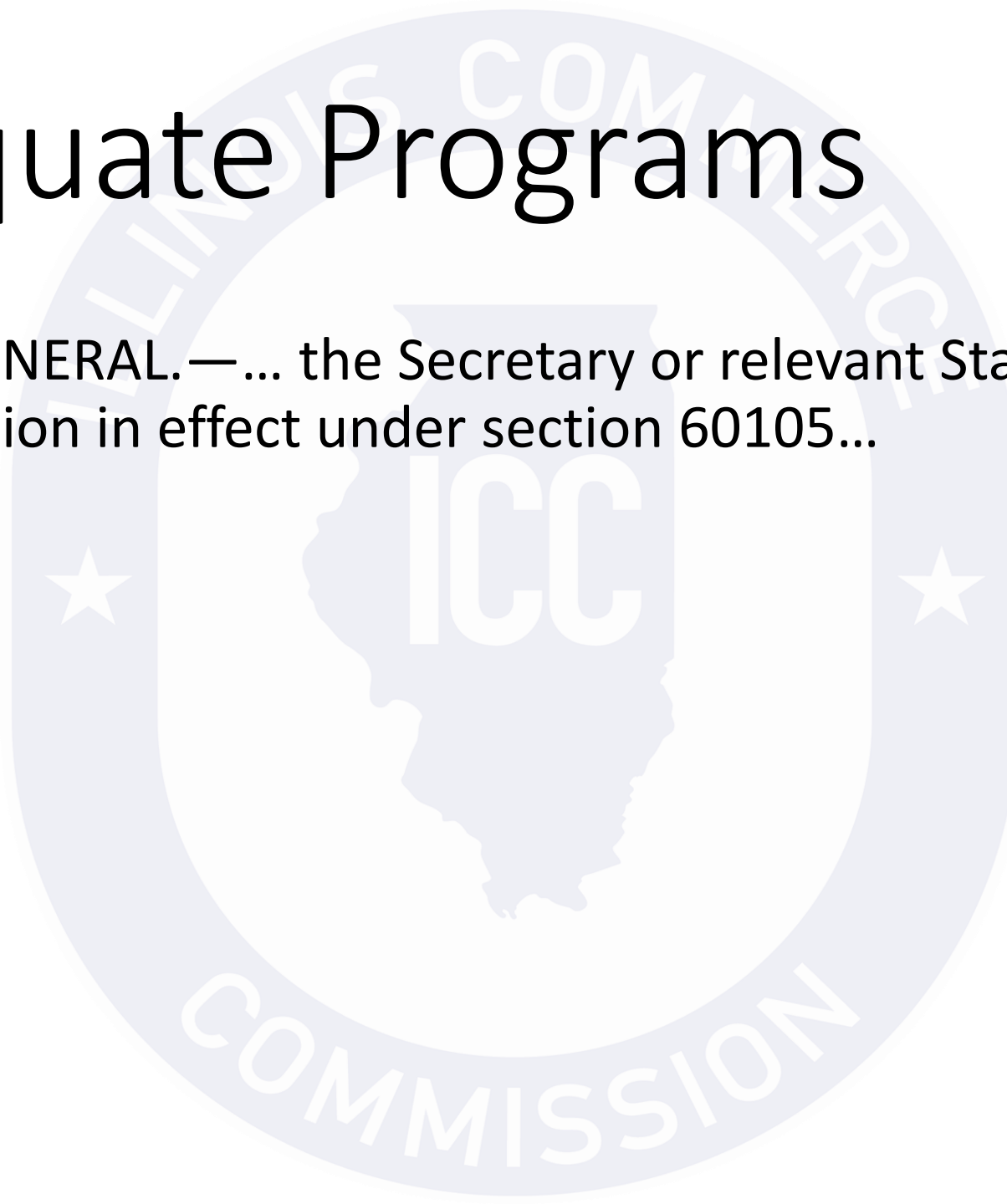
- Inspect Operator Programs to determine ...
  - (a)(2)(E) the extent to which the plan addresses the replacement or remediation of pipelines that are known to leak based on the material (including cast iron, unprotected steel, wrought iron, and historic plastics with known issues), design, or past operating and maintenance history of the pipeline.

# Inadequate Programs

(a) (3) (C) INADEQUATE PROGRAMS.—If the Secretary determines that a plan reviewed under this paragraph does not comply with the requirements of this chapter (including any regulations promulgated under this chapter), has not been adequately implemented, is inadequate for the safe operation of a pipeline facility, or is otherwise inadequate, the Secretary may conduct enforcement proceedings under this chapter.

# Inadequate Programs

(a) (3) (A) IN GENERAL.—... the Secretary or relevant State authority with a certification in effect under section 60105...

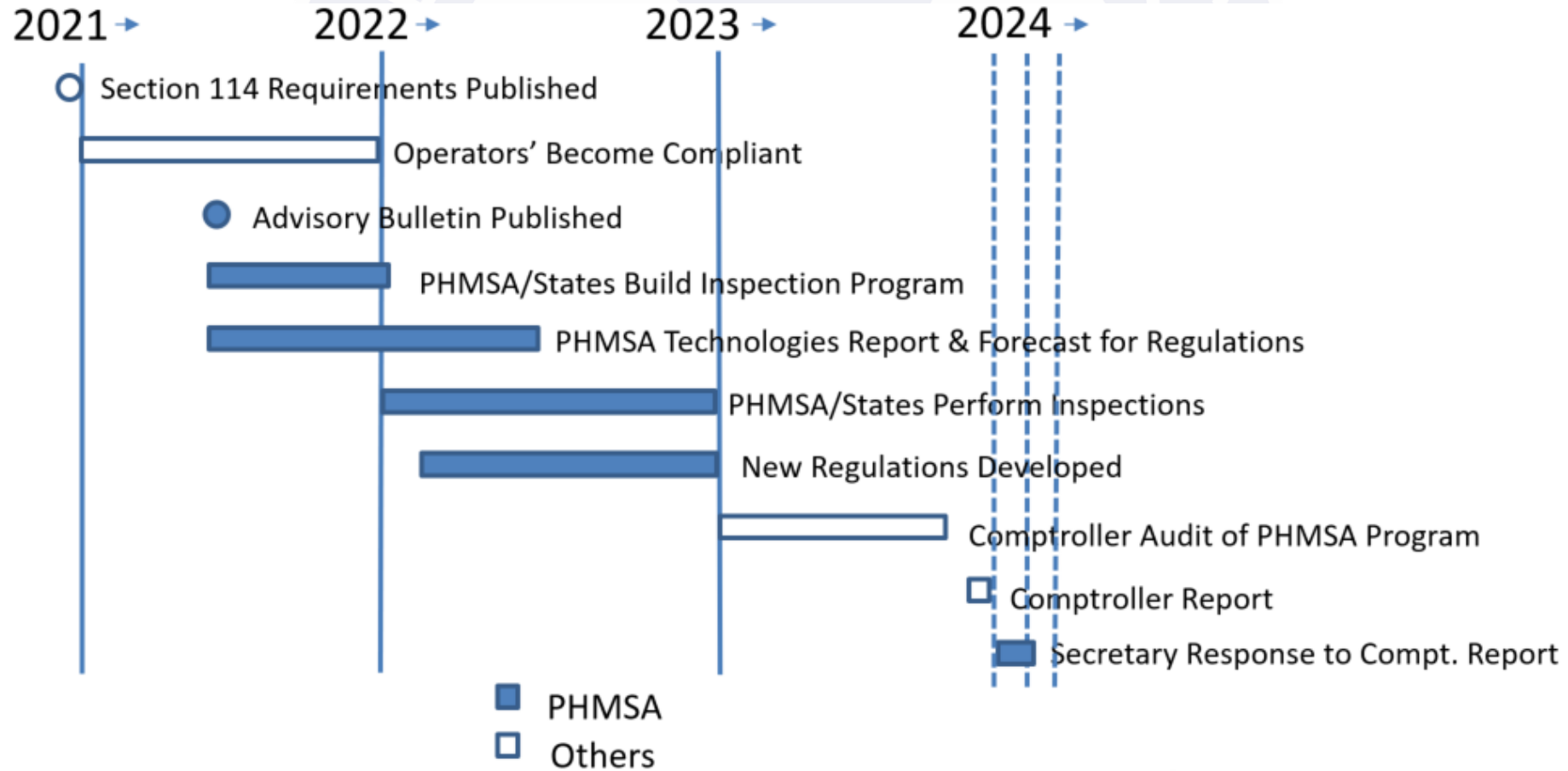


# Deadline

(b) DEADLINE.—Not later than 1 year after the date of enactment of this Act, each pipeline operator shall update the inspection and maintenance plan prepared by the operator under section 60108(a) of title 49, United States Code, to address the elements described in the amendments to that section made by subsection (a).

- December 27, 2021
  - All operators must have developed a plan
- December 27, 2022
  - All operators must be inspected
- Every five years going forward

# Rollout



# Checklist Development

- Section 114 team has worked to develop a checklist
- The checklist is being tested during pilot inspections





# Inspections

- In Illinois
  - Every operator will be inspected
    - Transmission, distribution, gathering, hazardous liquids, underground natural gas storage, etc.
  - Approximately 110 plans to review
  - Scott Grogan and Mickey Grewal will conduct all inspections
    - Will be completed by December 27, 2022
  - Matt Smith will lead inspections of large operators
  - PHMSA or NAPSAR may audit a single company

# Inspections

- Specific Requirements
  - 1) Reduction of Natural Gas Emissions from:
    - Fugitive Leaks
    - Intentional Releases from Operations, Maintenance and Emergency Activities
  - 2) Remediation or Replacement of Leak-Prone pipe
  - 3) Efforts must not erode pipeline safety
- Emission Reduction
  - Principally focused on operators who transport natural gas
  - Other operators who only use natural gas for power, controls or instruments
- Leak-Prone pipe criteria is for all operators, not just those who transport natural gas
- Inspections across all pipeline asset types: GT, GD, MM, UNGS, LNG, GG, HL
- PHMSA, and State Partners, to inspect all operators in 2022 to determine if they have established adequate programs in these areas

# Comptroller

- The Comptroller General of the United States
- Study the process used to review the plans
- Report to Congress
- Results of the study
- Recommendations how to further minimize releases

# Rulemaking

Section 114(d) requires PHMSA to conduct a study by June 28, 2022 discussing:

1. The best available technologies or practices to prevent or minimize release of natural gas when making planned repairs, replacement, or maintenance
2. The best available technologies or practices to prevent or minimize release of natural gas when operator intentionally vents or releases natural gas, including blowdowns
3. Pipeline facility designs that mitigate the need to intentionally vent natural gas

# Rulemaking

(d) (2) RULEMAKING.—Not later than 180 days after the date on which the Secretary submits the report under this subsection, the Secretary shall update pipeline safety regulations that the Secretary has determined are necessary to protect the environment without compromising pipeline safety.

# News Media

- Bloomberg News
- European satellite
- Specific day
- Specific locations
- One location was a reportable incident
  - Over 3 million cubic feet of gas escaped
- Other location unknown
  - Operator verified venting did not occur
  - Possibly other regulated pipeline not jurisdictional to ICC